

# **EXHIBIT 186**

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION

4                   -   -   -

5  
6           IN RE:   NATIONAL                   :   HON. DAN A.  
7           PRESCRIPTION OPIATE           :   POLSTER  
8           LITIGATION                   :     
9                   :     
10          APPLIES TO ALL CASES           :   NO.  
11                   :   1:17-MD-2804  
12                   :   

13                   - HIGHLY CONFIDENTIAL -

14           SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

15                   -   -   -

16                   January 15, 2019

17                   -   -   -

18                   Videotaped deposition of  
19           KEITH FROST taken pursuant to notice, was  
20           held at the offices of Morgan Lewis  
21           Bockius, 1701 Market Street,  
22           Philadelphia, Pennsylvania beginning at  
23           9:30 a.m., on the above date, before  
24           Michelle L. Gray, a Registered  
Professional Reporter, Certified  
Shorthand Reporter, Certified Realtime  
Reporter, and Notary Public.

                 -   -   -

25                   GOLKOW LITIGATION SERVICES  
26                   877.370.3377 ph| 917.591.5672  
27                   deps@golkow.com

1 is that what you said?

2 BY MR. CLUFF:

3 Q. An excessive ordering  
4 pattern in your experience as a manager  
5 from 2003 to 2014, did you believe that  
6 was suspicious?

7 MR. LAVELLE: Object to  
8 form.

9 THE WITNESS: Well, we  
10 didn't have an instance, what you  
11 just said.

12 BY MR. CLUFF:

13 Q. What do you mean you didn't  
14 have that instance?

15 A. You said as a manager, based  
16 on my experience, would excessive  
17 ordering be suspicious. Well, we didn't  
18 have that pattern of excessive ordering.  
19 And as a matter of fact, when we had the  
20 DEA audit back in 2012, they were real  
21 happy with our excessive ordering  
22 monitoring system. They walked through  
23 the whole cage because they spent all day  
24 there looking at how we picked all of our

1 pick list IDs, all of our postings, our  
2 control logs, how we audited 100 percent  
3 of our totes. And they were very, very  
4 happy with the way we had our controls in  
5 place, and they wished other places did  
6 the same thing we did.

7 And they didn't see -- we  
8 showed them the phone logs. They said  
9 you know, this is fine, you're keeping  
10 track of anything. And nothing looked  
11 out of place to them. That was the  
12 second of four audits they had of our  
13 facility.

14 Q. When that DEA audit  
15 occurred, did you tell them that you had  
16 never reported a suspicious order from  
17 the Perryman center?

18 A. I don't recall that.

19 MR. CLUFF: Let's take a  
20 little bit of a break.

21 THE WITNESS: Sure.

22 MR. CLUFF: Maybe just five,  
23 ten minutes.

24 THE VIDEOGRAPHER: Off the